UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA In re MDL No. 1285 VITAMINS ANTITRUST LITIGATION Misc. No. 99-197 (TFH) This Document Relates To: D&D FARMS, INC. and AZDAK, INC., D.D.C. No. 00 Civ. 2117 (TFH) South Dakota corporations on behalf of (Transferred from D.S.D.) themselves etc., FILED Plaintiffs. SEP 2 8 2001 -against-MANCY MAYER WHITTINGTON, CLERK U.S. DISTRICT COURT F. HOFFMANN-LA ROCHE LTD. et al., Defendants.

STIPULATION AND PROPOSED ORDER

IT IS HEREBY STIPULATED AND AGREED that plaintiffs shall have up to and including September 14, 2001, to respond to defendants' motion to dismiss the complaint. Defendants shall then have up to and including September 28, 2001 to reply to plaintiffs' opposition.

Dated: August 23, 2001

ZIMMERMAN REED, P.L.L.P. 901 N. Third St., Suite 100 Minneapolis, Minn. 55401-1016

Tel: (612) 341-0400 Fax: (612) 341-0844

Attorneys for Plaintiffs

Dated: August 23, 2001

By: Maynull
Margaret K. Pfeiffer (D.C. Bar # 358723)

SULLIVAN & CROMWELL 1701 Pennsylvania Avenue, N.W. Washington, D.C. 20006 (202) 956-7500

D. Stuart Meiklejohn Kate Usdrowski Matthew Solum SULLIVAN & CROMWELL 125 Broad Street New York, New York 10004 (212) 558-4000

Counsel for Eisai Co., Ltd. and (for the purpose of this stipulation only) on behalf of all served defendants

SO ORDERED, August ____, 2001

Hon. THOMAS F. HOGAN United States District Judge